



Modern Slavery Statement 2025

KPMG International Services Limited

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KPMG International Services Limited's Modern Slavery Statement 2025

This statement has been published in accordance with the Modern Slavery Act (UK) 2015 (the "Act"). It sets out the steps KPMG International Services Limited ("the Company", "we", "our" or "us"), has taken between 1 October 2024 to 30 September 2025 (the "Reporting Year") and will continue to take to prevent slavery and human trafficking from occurring in its business and supply chains.

We believe slavery and human trafficking are serious issues that must be tackled head on. In order to effectively address these issues and manage our efforts, we have adopted a proactive approach. A key priority for us remains to focus on our suppliers, prioritising our efforts to review, assess, and monitor

high and medium risk suppliers. This approach is considered the best for us given that the risk of slavery and human trafficking within the professional services industry is considered relatively low whereas our supply chain poses higher risk in certain industries and locations.

We are committed to demonstrating our progress over time, and in this fifth annual statement we set out the steps we have taken in this Reporting Year, and will continue to take over the coming year, to further embed modern slavery considerations in a way that is tailored and appropriate to our risk profile and business.

Our organisational structure and principal activities

The Company was incorporated as a private company limited by guarantee on 20 February 2020. It commenced its principal activities on 1 October 2020.

The principal activities of the Company and its subsidiaries are to provide services, products and support to, or for the benefit of, the member firms of the KPMG global organisation ("member firms").

The Company's key activities include, but are not limited to: supporting member firms in their execution of the KPMG global strategy across their Audit, Tax and Legal Services and Advisory businesses; managing its global procurement activities (including procuring technology products and services); managing global alliances with major technology vendors and other entities; developing and maintaining technology solutions to enhance member firms' services to clients and for their own use; providing certain technology and IT support for member firms; developing and implementing global client programs to assist and support client teams in member firms in proposing and winning work; assisting in the development of policies, processes and standards to be applied across member firms; monitoring compliance by member firms with KPMG quality standards; and facilitating the sharing of best practices, knowledge and data across the KPMG global organisation.

The objective of these principal activities is to further the economic interests of the member firms for their mutual benefit. The Company does not carry on trade, or other activities, with a view to profit and does not provide professional services to clients. Client services are exclusively provided by the member firms.

No member firm has any authority to obligate or bind the Company or any other member firm vis-à-vis third parties, nor does the Company have any such authority to obligate or bind any member firm.

Supply chain structure

We leverage a global supply chain to address most of our supply needs. The member firms are part of our supply chain; however, we interact with them differently than with our other suppliers in that the member firms are obliged to follow KPMG's policies and standards, including quality and risk management standards, in respect of how they operate and how they provide services to clients. Due to these differences between the member firms and our other suppliers, all references to "suppliers" and "supply chain" in this statement do not include the member firms. In addition, the supply chain-related steps outlined in this statement relate to suppliers contracted using our Global Procurement process, which represent the vast majority of our third-party supplier spend. Some services may be contracted by us outside of the Global Procurement process.

Our policies in relation to slavery and human trafficking

Policy commitment

We prioritise ethical behaviour, starting with KPMG's Global Code of Conduct (the "Code"). This includes not tolerating behaviour within KPMG or by suppliers that is illegal, unethical or that violates human rights. The Code demonstrates how our Values guide all our behaviors and actions. It defines what it means to work at and be part of KPMG, as well as our individual and collective responsibilities.

Everyone at KPMG is expected to comply with the Code and to confirm their compliance with the Code. Everyone is also required to take regular training which covers the Code. We are committed to holding ourselves accountable for behaving in a way that is consistent with the Code. Individuals are encouraged to speak up if they encounter something inappropriate or that is inconsistent with our Values.

The Code is a publicly available document that may be accessed at www.kpmg.com.

The KPMG Business and Human Rights Statement outlines our public commitment to aligning with the UN Guiding Principles on Business and Human Rights ("UNGPs") and applies to the Company. In line with the UNGPs, this Business and Human Rights Statement is a sign of our commitment to:

- Undertake to avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts when they occur, and
- Seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products or services through our business relationships.

Human rights impacts are monitored across KPMG as part of Global Quality & Risk Management processes. In addition, we have a Supplier Code of Conduct, a key objective of which is to require the suppliers with whom we have driven its adoption to assist us in our efforts to prevent modern slavery in our supply chain, and to set expectations for them to meet our same high standards and practices.

Due diligence processes

In the Reporting Year, we carried out the following actions:

Accountabilities and governance

We continued to operate our modern slavery working group to address slavery and human trafficking risks and to share best practice and knowledge in this area (the working group includes personnel from our Corporate Affairs, International Office of the General Counsel, Global Procurement, and Global People teams). This working group primarily focused its efforts on overseeing and coordinating the activities outlined in this statement, including addressing supply chain related slavery and human trafficking issues.

Risk analysis

We require suppliers to complete an annual survey to help us identify any inherent high-risk factors and assess whether they have appropriate measures in place to prevent modern slavery.

Building on this approach, we have continued to apply and enhance the supply chain risk methodology that we developed to ensure it remains robust and responsive to emerging risks as follows:

- To build maturity in this space, we redesigned our supplier survey to improve transparency and response

rates. The updated survey provides deeper insights into inherent risk indicators, such as operations in high-risk geographies. To help ensure accuracy, we supplemented survey data with intelligence from reputable external sources.

- We maintained our focus on suppliers with high-risk indicators. In addition to identifying inherent risk factors, we assess governance maturity—policies, standards, and controls—within suppliers' operations and their extended supply chains.
- We continued to apply a robust scoring mechanism underpinned by Key Performance Indicators (KPIs) to monitor progress and drive accountability. Where clarification was needed, we followed up with suppliers to ensure completeness and accuracy of the risk analysis.
- To evolve our approach, we segmented our suppliers based on supplier size and spend, enabling us to tailor supplier engagement strategies according to associated risks and performance indicators.

Supplier engagement

We achieved higher supplier engagement through enhancing the design of our supplier survey and a more coordinated internal approach to address non-responses. To support our priority suppliers, we launched a supplier toolkit aligned with our Supplier Code of Conduct, providing actionable guidance and best-practice examples to mitigate modern slavery risks. This resource is aimed at supporting suppliers to adopt responsible business standards, reinforcing our commitment to ethical practices throughout the supply value chain.

By leveraging KPI insights and our supplier segmentation model, we focused efforts on high-priority suppliers, delivering tailored feedback highlighting opportunities for improvements. This proactive approach will be scaled in the coming year to build greater resilience across the supply chain.

During this Reporting Year, we improved the way we conduct supplier surveys. Due to technology systems requirements, surveys can only be issued to suppliers who have contractually agreed to KPMG's online terms. As a result, unlike previous years, a limited number of suppliers were not included in this year's survey process. We continue to monitor these relationships and remain committed to strengthening our approach. We will review opportunities to broaden coverage and enhance due diligence in future reporting cycles.

We recognize that modern slavery is a complex issue, and different organisations are at different stages of maturity in addressing it. Our supplier engagement approach continues to raise awareness and share insights from our own practices to build supplier capability. Looking ahead, we plan to deepen engagement through targeted initiatives such as webinars and other collaborative forums.

Risk escalation

We maintain a risk escalation framework as part of our governance model for managing risks associated with high-risk suppliers. This framework evaluates multiple dimensions of risk and establishes a clear process for escalation to the senior management of the Company when supplier actions or practices diverge from established guidelines, or when supplier-related risks such as integrity concerns or modern slavery indicators may have a significant impact on the business.

Ongoing monitoring and Due diligence

As modern slavery and human trafficking issues often strongly correlate with financial crimes, any identified fraud or money laundering arising from our due diligence process may indicate a supplier is high-risk. Throughout the Reporting Year, we continued to use our supplier integrity risk screening process (which may identify potential financial crimes) before onboarding new suppliers in our supply chain.

The scope of our integrity screening process has been broadened to cover additional categories of suppliers. This now includes suppliers who are contracted solely through the signing of Non-Disclosure Agreements

(NDAs), as well as suppliers who are not engaged via our standard procurement process. By expanding the integrity screening, we have established a more comprehensive approach to risk management and due diligence across all supplier relationships. It is important to note that this integrity screening process is separate from the annual supplier survey that we conduct. Currently, suppliers who only sign NDAs and those classified as pay-only suppliers are not included in the annual survey. The enhanced integrity screening ensures these groups are reviewed, even though they remain outside the scope of the annual survey at this time.

Sustainable procurement policy

We have developed an internal procurement policy that sets out the guidelines and requirements that apply when contracting with third party suppliers for goods, services or technology. This policy is designed to govern sourcing decisions, supplier selection and contracting in line with our sustainability and ethical procurement ambitions. It includes specific requirements for our suppliers to uphold ethical standards and ensure worker protection within their own organizations and across their supply chains. As we roll out the policy, compliance with these expectations is expected to become mandatory over time.

Supplier code of conduct

The adoption of our Supplier Code of Conduct remains a key priority. It is a standard policy for all our procurement-negotiated supplier agreements, unless suppliers have a code of conduct with substantially similar terms.

Training and capacity

An interactive training session was conducted for our procurement professionals, building on previous sessions and supporting ongoing capacity development.

Our procurement onboarding program includes mandatory modern slavery training and provides access to recorded sessions from key training sessions delivered previously.

Grievance and Remediation

In the Reporting Year, we carried out the following actions with regards to grievance and remediation:

The KPMG International Hotline continues to be the reporting mechanism for making and responding to reports about modern slavery concerns. This enables efficient investigation, and if substantiated, rectification, of reported modern slavery incidents. The KPMG International Hotline is available to all KPMG personnel, clients (of member firms) and other third parties (such as suppliers, contractors, sub-contractors, external consultants or alliance partners) to confidentially report concerns they have about the activity of any KPMG entity, KPMG personnel or KPMG supplier. All reports to the KPMG International Hotline are confidential, and anonymity is provided to those who request it. Individuals are encouraged to report without fear of retaliation, and it is explicitly noted that retaliation is a

serious violation of our Global Code of Conduct. To date, no modern slavery complaints have been received by the KPMG International Hotline.

We continue to engage with our suppliers to ensure transparency in our supply chain and to create an

environment and opportunity for suppliers to report concerns relating to their ability to comply with our Supplier Code of Conduct. Such reports would prompt additional investigation and discussion.

Next steps

For financial year 2026, we plan to carry out the following actions:

Policy commitment

We intend to:

- Identify opportunities to strengthen our public modern slavery policy commitment.
- Continue to expand adoption of our Supplier Code of Conduct and evaluate options to further refine the language in that Code around modern slavery.
- Continue Modern Slavery Working Group meetings to track our efforts and identify opportunities to improve.

Due diligence

We expect to continue to use lessons learned from our supplier surveys and other efforts addressing modern slavery to refine our approach to modern slavery due diligence. Based on such lessons, we intend to:

- Continue to refine and enhance our survey methodologies to improve response rates.
- Identify the possibility of embedding modern slavery risk assessments into our supplier onboarding process.
- Identify publicly available information or licensed data sources to further enhance our due diligence around our supply chain ethical business practices.

Monitoring effectiveness

Continue to review our established metrics so that we can evaluate the progress we are making with respect to addressing modern slavery and human trafficking.

Supplier Engagement

We plan to strengthen our supplier engagement by fostering meaningful dialogue with our suppliers. Our objective is to increase awareness of modern slavery issues and cultivate collaborative partnerships to drive positive change where appropriate. To achieve this, we will evaluate a range of engagement methods, including individual discussions and webinars.

We will keep focusing on high-risk suppliers but also introduce the supplier toolkit to those without high-risk factors, helping them improve KPIs and address modern slavery risks.

Sustainable Procurement Policy

As part of the implementation of our sustainable procurement policy, we intend to educate and raise awareness among internal business stakeholders regarding the significance of evaluating and addressing ethical business practices within our supply chain.

We intend to seek collaboration opportunities for supplier engagement with our internal stakeholders, to help us drive change and compliance with our ethical supplier requirements.

Capability building

A continued capability building program is critical to ensure the importance of combating modern slavery in our supply chain resonates with all personnel involved in managing supplier relationships. We plan to:

- Continue to deliver modern slavery training and awareness sessions to our procurement professionals and commercial contracting and procurement lawyers.
- Collaborate closely with the relevant procurement professionals during supplier engagements to reinforce expectations and promote best practice.

This statement was approved by the Board of KPMG International Services Limited, and is signed by:

Bill Thomas
Global Chairman and CEO
KPMG International

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